

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

**NORMAN E. LACEY,**

**Plaintiff,**

**V.**

**CITY OF AUBURN,**

**Defendant.**

**CASE NO: 3:06-CV-1145-MEF**

## **DEFENDANT'S OBJECTIONS TO PLAINTIFF'S DEPOSITION DESIGNATIONS**

**COMES NOW** the Defendant City of Auburn and herewith objects to the following deposition testimony designated by Plaintiff:

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As the Defendant interprets the Court's Uniform Scheduling Order, there is no requirement at this time to set forth the grounds for said objections. However, to the extent the Defendant may be in error, this Defendant objects to Plaintiff's designated deposition testimony as inadmissible pursuant to Rule 401; Rule 402; Rule 403; Rule 701; Rule 801; Rule 802; conjectural; self-serving; improper and inadmissible opinion testimony; and, is otherwise inadmissible.

/s/ *Randall Morgan*

Randall Morgan [MORG8350]  
Attorney for Defendant City of Auburn

OF COUNSEL:  
HILL, HILL, CARTER, FRANCO,  
COLE & BLACK, P.C.  
425 South Perry Street  
Montgomery, Alabama 36104  
334-834-7600

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 11<sup>th</sup> day of April, 2008, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to the following via email:

Roderick E. Cooks, Esq.  
Winston Cooks, LLC  
The Penick Building  
319 17<sup>th</sup> Street North  
Birmingham, Alabama 35203

/s/ *Randall Morgan*

OF COUNSEL